



November 12th, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

In Re: RM No. 11648
RM No. 11649

Dear Ms. Dortch:

On Friday, November 8th, Terry Mansfield, David Eierman and the undersigned, all of Motorola Solutions, Inc. ("MSI"), met with Blaise Scinto, John Schauble, Steve Buenzow and Chris Andes of the Wireless Telecommunications Bureau. The meeting was to discuss two outstanding Petitions for Rulemaking recommending amendments to the Commission's Part 74, Subpart D rules, filed by the Society for Broadcast Engineers, Inc. ("SBE")¹ and the Engineers for the Integrity of Broadcast Auxiliary Services Spectrum ("EIBASS")², respectively.

During the meeting, the following points were discussed:

- MSI expressed support for the proposals made in each of the above-referenced Petitions to initiate a rulemaking to update 47 CFR § 74.462, as appropriate, to allow additional digital emissions designators to be used by Broadcast Auxiliary Services ("BAS") licensees for Remote Pickup (RPU) Broadcast Stations. The proposed updates would allow digital communication technologies such as those based on Time Division Multiple Access (TDMA) to be used in this band.
- MSI also urged the Commission to consider granting the Request for Temporary Waiver³, filed by the SBE in conjunction with its Petition for Rulemaking, requesting that the FCC waive the current restrictions on emissions designators in the Part 74, Subpart D rules to temporarily allow additional types of digital transmitters to be used by BAS licensees for RPU Broadcast Stations, pending such a rulemaking.

¹ Petition for Rulemaking filed, by the Society of Broadcast Engineers, Inc., RM-11648, submitted Nov. 7th, 2011 ("SBE Petition")

² Petition for Rulemaking filed, by the Engineers for the Integrity of the Broadcast Auxiliary Services Spectrum, RM-11649, submitted Oct. 7th, 2011 ("EIBASS Petition")

³ Request for Temporary Waiver, filed by the Society of Broadcast Engineers, Inc., submitted Nov. 7th, 2011 ("SBE Waiver")



- During the course of the discussion MSI explained both the flexibility and the limitations that currently exist when programming the frequencies of Land Mobile Radio (LRM) equipment, and how this process would be impacted by the different options proposed for revising the Part 74 frequency plan, as detailed in the above-referenced Petitions.
- MSI also described some of the challenges that are currently faced by both Broadcast and Business/Industrial frequency coordinators when coordinating licensing requests for Part 74 frequencies, and how changes to the band plan might impact the coordination process.
- During the discussion, Motorola requested that the Commission, as part of the proposed rulemaking, consider either allowing Part 90-authorized equipment to be utilized by Part 74 licensees, or for the Part 74 rules to be harmonized with the Part 90 rules, to improve the efficiency of the equipment authorization process for equipment designed to operate in the Part 74 spectrum.

Respectfully Submitted,

/s/ Chuck Powers

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